

162054

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: November 24, 1976

SUBJECT: Results of November 16, 1976 Meeting With Monsanto Regarding PCB's

FROM: Roy M. Harsch *R M Harsch*
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TO: Files

We met with representatives of Monsanto on Tuesday, November 16, 1976, in St. Louis and at their Sauget plant. Mr. Roscoe Libby of the Illinois District Office was also at the meeting.

We presented Monsanto with the latest sampling results we had. We also discussed the use of a consent order to formally embody any program to which we might agree.

Monsanto flatly rejected the concept of a consent decree and left no question in our mind as to their position regarding any unilateral enforcement order.

Having cleared the air, we discussed the possibility of incorporating a PCB program into any permit issued to Sauget. Monsanto would accept this alternative.

We then discussed what we felt should be done to reduce the level of PCB's discharged from Sauget's treatment plant to an acceptable level.

We then inspected Monsanto's PCB production facility in Sauget and the Sauget treatment plant. The three of us have reached the conclusion that Monsanto's present operation is as tight as possible. We further believe that there is no effective further treatment which can be implemented prior to their curtailment of production to further reduce PCB's in their discharge, other than completion of the Sauget STP which is already in progress.

We propose the following plan to reduce PCB's from Monsanto and Sauget. From our inspection of Sauget's new treatment plant, it is our professional judgement that PCB's will be reduced by removal of the vast quantity of oil and grease present in Sauget's influent and by the chemical sludge generated in the plant. We believe that this plant when it is operational in April of 1977 and Monsanto's stoppage of production by August 31, 1977, will significantly reduce the levels of PCB's discharged by Sauget. The following program should document this reduction and provide the information needed to determine if further treatment is necessary.

Interim PCB Limitation

<u>Limitation</u>	<u>Monitoring</u>
2 lb. Daily Average	1/week 24-hour composite sample
4 lb. Daily Maximum	1/week 24-hour composite sample

Final PCB Limitation

0 mg/l Daily Maximum

Based upon present information Monsanto appears to be the principle discharger of PCB's into the Sauget treatment plant. Monsanto has agreed to stop all production of PCB's by August 31, 1977, and has further agreed to stop distributing PCB's by October 31, 1977. Therefore, Monsanto and Sauget agree to carry out the following PCB reduction program:

1. Monsanto shall continue its present practice of "good housekeeping" to limit PCB spills.
2. Monsanto shall continue its present practice of vacuuming the three sumps located in the sewer line leading from the PCB production facilities.
3. Monsanto and Sauget agree to conduct the following monitoring program:

A. Prior to Production Shutdown

<u>Sampling Location</u>	<u>Frequency</u>	<u>Type</u>
1. Sauget Effluent	Twice Monthly	24-Hour Composite
2. Sauget Influent	Twice Monthly	24-Hour Composite
3. Sauget Oil-Grease and Sludge	As Necessary to Establish Mass Balance at Sauget STP and Average Concentrations.	
4. Monsanto Incinerator Discharge	Twice Monthly	24-Hour Composite
5. Monsanto Combined Discharge	Twice Monthly	24-Hour Composite
6. Dead Creek and 18" Village Sewer	As Necessary to Establish Average Loads From These Sources.	
7. Such other sampling as is needed to contribute to the PCB discharge elimination program being implemented by Monsanto.		

B. Following Production Shutdown

<u>Sampling Location</u>	<u>Frequency</u>	<u>Type</u>
(1 - 6)	As Above Except That in Every Case Twice Monthly is Changed to Weekly.	
(7)	Such Other Sampling as is Needed to Determine the Existence of Contaminated Sewers or Runoff Areas and to Otherwise Contribute to Monsanto's PCB Discharge Elimination Program.	
4. Monsanto and Sauget agree to the following Reporting Requirements:		
a.	August 31, 1977, Monsanto will confirm PCB Production Shutdown.	
b.	October 31, 1977, Monsanto will confirm PCB Distribution termination.	
c.	December 31, 1977, Monsanto and Sauget will submit their analysis of the monitoring data and a report on the success of the Monsanto PCB Discharge Elimination Program to achieve the final limitations of zero PCB discharge.	